

Teny Geragos

From: Teny Geragos
Sent: Sunday, June 1, 2025 9:35 PM
To: SubramanianNYSDChambers; Comey, Maurene (USANYS); Foster, Meredith (USANYS); Johnson, Emily (USANYS) 2; Smyser, Madison (USANYS); Mitzi Steiner; Slavik, Christy (USANYS)
Cc: Marc Agnifilo; thesteellawfirm; Anna Estevao; Alexandra Shapiro; Jason A. Driscoll; xdonaldson; nw@westmorelandlawgroup.com
Subject: US v. Combs - 6/1 trial issues

Dear Chambers:

We write in advance of tomorrow's testimony to make Court aware of possible evidentiary issues:

1. Mia

We have produced all exhibits we intend to use with Mia tomorrow, including for impeachment. We understand the government has objections to some of those exhibits, which it will raise in a letter this evening.

2. Sylvia Oken

Counsel does not foresee any evidentiary issues with this witness.

3. Frank Piazza

We believe that the government's audio/visual expert will testify tomorrow. The government has marked 10 additional exhibits (other than GX 10C-102, 103, and 105, which are already in evidence) for admission through Mr. Piazza. We conveyed to the government that we object to these new exhibits, because they are compilations of existing evidence that results in unduly prejudicial videos. In other words, our objection is rooted in 403. We believe the government should rely on the admitted evidence that the Court ruled on in the motions *in limine* and should not permit the additional 10 videos. We will be ready to address this orally tomorrow morning.

Respectfully,
Teny



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